

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AIDAN ISRAEL and CHALSE OKOROM,

Plaintiffs,

vs.

SAFECO INSURANCE COMPANY OF  
AMERICA,

Defendant.

No. 2:23-cv-01788-MJP

**DECLARATION OF JENNIFER E.  
ARAGON IN SUPPORT OF  
OPPOSITION TO MOTION FOR  
REMAND**

I, Jennifer E. Aragon, hereby declare, under penalty of perjury and in accordance with the laws of the State of Washington, that:

1. I am one of the attorneys representing the defendant in this matter. I am over the age of 18 years, have personal knowledge of the matters addressed in this Declaration, and am competent to testify on those matters.

2. In *Honchar vs. Hirsch Glass Corp.*, King County Superior Court No. 21-2-00268-1 KNT, Hirsch served interrogatories and requests for production on the plaintiff and obtained answers. In addition, Honchar retained experts, and took the depositions of two witnesses before filing a Motion for Summary Judgment.

DECLARATION OF JENNIFER E. ARAGON IN SUPPORT OF  
OPPOSITION TO MOTION FOR REMAND – 1  
CAUSE NO. 2:23-cv-01788-MJP

**FORSBERG & UMLAUF, P.S.**  
ATTORNEYS AT LAW  
901 FIFTH AVENUE • SUITE 1400  
SEATTLE, WASHINGTON 98164  
(206) 689-8500 • (206) 689-8501 FAX

3. Attached as **Exhibit 1** is a true and correct copy of the plaintiffs' contract with Miggy Movers.

4. Attached as **Exhibit 2** is a true and correct copy of the Plaintiffs' Complaint filed in King County Superior Court against Miggy Movers, Case no.23-2-00337-3 SEA.

5. Attached as **Exhibit 3** is a true and correct copy of selected claim file logs notes from Safeco Claim no. 049856527.

6. Attached as **Exhibit 4** is a true and correct copy of the Complaint filed in King County Superior Court, with exhibits.

7. Attached as **Exhibit 5** is a true and correct copy of the Proof of Service filed by CSC.

8. Attached as **Exhibit 6** is a true and correct copy is a true and correct copy of an email with inventory lists.

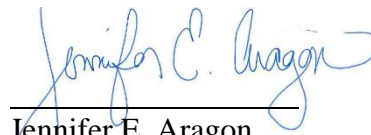
9. Attached as **Exhibit 7** is a true and correct copy is a true and correct copy of the Demand from counsel.

10. Attached as **Exhibit 8** is a true and correct copy is a true and correct copy of the email between counsel regarding IFCA Notice.

11. Attached as **Exhibit 9** is a true and correct copy of Order Granting Leave to File Amended Complaint dated October 13, 2023.

12. Attached as **Exhibit 10** is a true and correct copy of the Amended Complaint and Exhibits.

SIGNED this 8th day of January, 2024, in Seattle, Washington

  
Jennifer E. Aragon

DECLARATION OF JENNIFER E. ARAGON IN SUPPORT OF  
OPPOSITION TO MOTION FOR REMAND – 2  
CAUSE NO. 2:23-cv-01788-MJP

**FORSBERG & UMLAUF, P.S.**  
ATTORNEYS AT LAW  
901 FIFTH AVENUE • SUITE 1400  
SEATTLE, WASHINGTON 98164  
(206) 689-8500 • (206) 689-8501 FAX

**CERTIFICATE OF SERVICE**

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On the date given below I caused to be served the foregoing ***DECLARATION OF JENNIFER E. ARAGON IN SUPPORT OF OPPOSITION TO MOTION FOR REMAND*** on the following individuals in the manner indicated:

Sam Leonard  
LEONARD LAW, PLLC  
9030 35<sup>th</sup> Avenue SE, Suite 100  
Seattle, WA 98126

*Attorney for Plaintiffs*

(X) Via ECF  
(X) Via Email

**SIGNED** this 8<sup>th</sup> day of January 2023, at Seattle, Washington.

*s/Barbara Petro*  
Barbara Petro

DECLARATION OF JENNIFER E. ARAGON IN SUPPORT OF  
OPPOSITION TO MOTION FOR REMAND – 3  
CAUSE NO. 2:23-cv-01788-MJP

**FORSBERG & UMLAUF, P.S.**  
ATTORNEYS AT LAW  
901 FIFTH AVENUE • SUITE 1400  
SEATTLE, WASHINGTON 98164  
(206) 689-8500 • (206) 689-8501 FAX